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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, MARIA NGUYEN,  
WILLIAM BYATT, JEREMY DAVIS, and  
CHRISTOPHER CASTILLO, individually  
and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO EXTEND  
TIME FOR GOOGLE TO FILE ITS  
MOTION FOR PROTECTIVE ORDER  
AGAINST NON-PARTY SUBPOENAS**

Judge: Honorable Susan van Keulen

Pursuant to Civil Local Rule 6-2, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, in September and October 2021, Plaintiffs served non-party subpoenas dated September 14, 2021 on Ernst & Young LLC (“E&Y”), PricewaterhouseCoopers (“PwC”), and Promontory Financial Group (“Promontory”);

WHEREAS, Plaintiffs set a date of compliance on all three non-party subpoenas for October 22, 2021;

WHEREAS, E&Y and PwC served their objections and responses to Plaintiffs’ non-party subpoena on September 29, 2021, and October 20, 2021, respectively;

WHEREAS, Promontory has not served its objections and responses to Plaintiffs’ non-party subpoena;

WHEREAS, the Parties agree that an extension of time of 6 days will provide the parties with sufficient time to meet and confer to resolve or narrow disputes and to submit a 5-page, double-spaced joint letter brief on any remaining disputes;

NOW THEREFORE, the Parties stipulate to extend the deadline by which the parties shall submit a 5-page, double-spaced joint letter brief related to Google’s motion for a protective order against Plaintiffs’ non-party subpoenas to Thursday, October 28, 2021 at 4 PM PT.

DATED: October 20, 2021

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO FILE ITS MOTION FOR PROTECTIVE ORDER. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: October 20, 2021

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

*Counsel on behalf of Google*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for the parties to submit a 5-page, double-spaced joint letter brief on Google's Motion for Protective Order Against Plaintiffs' Non-Party Subpoenas shall be extended to Thursday, October 28, 2021 at 4 PM PT.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

\_\_\_\_\_  
Hon. Susan van Keulen  
United States Magistrate Judge